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Attorney for, GARCIA-RODRIGUEZ

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HON. THOMAS J. WHELAN)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FRANCISCO GARCIA-RODRIGUEZ,

Defendant.

Case No. 08-CR-1971-W

DECLARATION OF DAVID
BAKER AND REQUEST TO
MODIFY BOND CONDITIONS
AND STIPULATION OF PARTIES

Date: SEPT 4, 2008
Time:

I am Attorney of Record in the above entitled case for Defendant Francisco Garcia. One of the conditions for Mr. Garcia's pre-trial release allows Mr. Garcia to travel to Mexico two days per week for work. The court made it a requirement for Mr. Garcia to leave two car titles with the court as a condition of Francisco's travel to Mexico. The condition was added to the bond by modification in front of Judge Papas on June 16, 2008. Mr. Garcia is in the business of selling vehicles and he is hoping to sell the vehicles the court is holding title to. I have spoken at length with Pre Trial officer Eleonor Ruiz and Assistant U.S. Attorney James Melendres about the issue of car titles. We are all in agreement that the condition requiring Mr. Garcia to leave car titles with the court should be lifted. I respectfully request the court to lift the requirement that two car titles be left on file at the clerks office..

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2 **Stipulated to by Defense Counsel, Pre Trial and the U.S. Attorneys office.**

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4 **So Stipulated:**

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7 **J / Melendres**_____

8 **James Melendres**

9 **Assistant U.S. Attorney**

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11
12 **e/Ruiz**_____

13 **Eleonor Ruiz**

14 **Pre-Trial**

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16
17 **d/Baker**_____

18 **David Baker**

19 **Attorney for Francisco Garcia**

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